

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

VISHVA DESAI and PHILIP J. CHARVAT on
behalf of themselves and others similarly
situated,

Plaintiffs,

v.

ADT SECURITY SERVICES, INC.,

Defendant/Third Party Plaintiff,

PETE TOLMAN, LEADS DIRECT MARKETING,
VOICE TEL CORP., CHRISTOPHER LONG,
EMI, INC., CITY VIP, LLC, JMB ENTERPRISES,
DIRECT SAVINGS USA, INC., OSCAR
MONTENEGRO, EVERSAFE SECURITY
SYSTEMS, INC., SAFE STREETS USA, LLC,
PARAMOUNT MEDIA GROUP, THE ELEPHANT
GROUP, INC., and UNKNOWN JOHN DOE
DEFENDANTS I THROUGH XX,

Third-Party Defendants.

SAFE STREETS USA, LLC, SUCCESSOR BY
MERGER TO EVERSAFE SECURITY
SYSTEMS, INC.,

Fourth-Party Plaintiff,

v.

DIRECT SAVINGS USA, LLC,

Fourth-Party Defendant.

Case No. 1:11-cv-01925

Judge Elaine E. Bucklo

NOTICE OF SATISFACTION OF CONSENT JUDGMENT

On January 30, 2015, this Court entered a Memorandum Opinion and Order awarding Third Party Plaintiff, ADT SECURITY SERVICES, INC. (“ADT”) \$8,000,000.00 against Third Party Defendant, ELEPHANT GROUP, INC. (“EG”)

and reserved jurisdiction to determine the amount of attorney's fees and costs that ADT could recover against EG [DE 304]. Thereafter, on June 26, 2015, ADT and EG entered into a Settlement Agreement concerning the pending matter ("Settlement Agreement") whereby the parties stipulated that the total amount of the judgment, including costs, attorney's fees and interest was \$11,500,000.00. Thereafter, on October 5, 2015, this Court approved and entered a Consent Judgment reflecting the Settlement Agreement, awarded judgment in ADT's favor and against EG in the amount of \$11,500,000.00, specifically acknowledged the enforceability of the Settlement Agreement and that "[u]pon satisfaction of this Consent Judgment, EG will file and record an appropriate Satisfaction of Judgment with the Court" ("Consent Judgment") [DE 350]. Pursuant to the terms of that certain Release and Satisfaction Agreement dated January 13, 2017 between the parties, Qology Direct Holdings, Inc. f/k/a Elephant Group, Inc., fully satisfied the Consent Judgment.

Respectfully Submitted,

*The Elephant Group, Inc., Third-Party
Defendant*

/s/ Joel D. Bertocchi

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CERTIFICATE OF SERVICE

I certify that on March 21, 2017, the preceding document was filed electronically with the Court using the CMF/ECF system, which will accomplish service on all counsel of record.

/s/ Joel D. Bertocchi